

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF
H.L., LMFTA

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, H.L., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Mercer Island, Washington with my family. Out of fear and a desire to
5 protect my family, I am choosing to use initials for myself in this declaration.

6 3. I am a Licensed Marriage and Family Therapist-Associate, licensed by the
7 Washington State Department of Health. I earned a Bachelor's degree in Psychology from
8 University of Washington in 1999, and a Masters of Couples and Family Therapy from Antioch
9 University in 2024. I have a certificate in play therapy and am currently working toward
10 credentialing as a Registered Play Therapist. Since 2023, I have provided individual and family
11 therapy services to children from age four, to young adults aged 22. I've worked under the
12 supervision of three licensed therapists as I've completed my licensure.

13 4. As a Play Therapist, I provide gender-affirming care to children by observing and
14 letting them lead. In addition to providing support to my patients so that they may thrive, I
15 provide coaching, education, and resources for parents. I refer younger patients and their parents
16 to gender care specialists, and work with adolescents undergoing medical gender affirmative
17 care to help them navigate their journey.

18 5. In my role as a play therapist, I have worked with many LGBTQ+ transgender
19 and gender-expansive youth. I currently see 15 transgender patients weekly. My youngest
20 transgender client is six years old.

21 6. When the younger children I treat first come to me, they generally feel that they
22 don't fit in—with school, friends, family, or in life in general. With this feeling is often a refusal
23 to go to school and having symptoms such as stomach aches caused by stress and anxiety.
24 Usually, my transgender and non-binary clients have already started the process of questioning
25 and exploring their gender identity. For example, I have a six-year-old patient who, from the
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1 moment they could talk, has asked their parents to use different pronouns than those assigned to
2 them at birth.

3 7. The older youth I treat generally experience self-hatred, suicide ideation,
4 self-harm such as cutting, depression, and the pervasive sense that they don't feel "right" in their
5 bodies. Every time they look at themselves and their bodies, it brings up this incongruency to
6 who they are.

7 8. The gender-affirming care I provide is client-led. For younger patients, play
8 therapy consists of witnessing their play and the anxieties that come up during play. The children
9 lead me through their play, and I observe while providing compassion and empathy as they
10 process through and express emotions and feelings that arise through play. For example, a
11 six-year-old will usually have a difficult time developmentally putting words to their feelings.
12 As a therapist I utilize play with this age group to watch themes develop and support clients.
13 Clients this age can understand self-identity but may have difficulty putting words to how they
14 feel in their social world.

15 9. I generally employ talk therapy with youth ages 11 and above. I provide
16 dialectical behavioral therapy, much of which is just coping skills. These kids are hurting a lot.
17 We work on how to deal with situations they can't control through breathing exercise,
18 mindfulness, and other methods to confront stressors in their lives.

19 10. A major part of gender-affirming therapy is educating parents and caregivers on
20 addressing gender dysphoria and supporting their child as they work towards a greater
21 understanding of their gender identity. I support parents in this process. Parents and caregivers
22 can often feel confusion and fear at first, especially given the national climate with anti-trans
23 rhetoric and laws. I find a lot of these parents have done a lot of research. I'll ask a lot of
24 questions, what are they seeing, and ask what they are looking for in terms of support.

25 11. The decision to seek medical gender-affirming care depends on the client and is
26 100% a decision that is made between the youth I see, their parents or caregivers, and their

1 doctor. When appropriate, I will refer my clients and their families to facilities here in
2 Washington that can help them take the next steps in that process.

3 12. Many of my adolescent clients under the age of 19 receive hormone replacement
4 therapy and other forms of medical gender-affirming care. This treatment is crucial, and is
5 necessary to minimize the impacts that transgender and gender expansive youth feel once their
6 bodies start changing during and after puberty in a way that does not align with their gender
7 identity.

8 13. Once patients start receiving gender-affirming care, the difference is like seeing
9 a depressed person and a person recovered from depression. There is a lightness once they're
10 seen for who they are and can be who they are.

11 14. I have never heard a kid express regret from choosing to receive gender-affirming
12 care. There are some instances where patients experience uncomfortable side effects from
13 medication or other forms of care, but in my experience that has not led the youth want to give
14 up the process of receiving gender-affirming care altogether.

15 15. I understand that the President of the United States has issued an Executive Order
16 that restricts and criminalizes providing gender-affirming care to people under 19 years old.
17 Before the election, I saw lightness in my transgender clients. But not anymore. They fear what
18 life is going to look like if they can't receive the care they've been receiving for the past several
19 years. In the last couple of weeks, the stress and anxiety has been off the charts for my clients.
20 Some of my clients have had suicidal ideations return. My younger clients are exhibiting chaotic,
21 angry emotions during play therapy. They are extremely anxious about school and socializing.
22 They have many fears. I've had to stretch coping strategies with the younger kids.

23 16. The parents whose children I treat are suffering along with their kids. As a result,
24 I've had to refer parents out to receive their own therapy and mental health treatment to cope
25 with the grief and deep sadness they feel for their children for the future. These parents are
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1 terrified that others may feel emboldened by the Executive Order's cruelty and, as a result,
2 harm their child.

3 17. The Executive Order is also causing significant distress to my younger patients
4 who are gender expansive and starting to explore their gender identity, but may not yet identify
5 as transgender or non-binary. The Order is even more distressing for my older clients who have
6 been able to live as their true selves for the last few years, but now see that possibility being
7 taken away.

8 18. The Executive Order is causing harm by its existence. It is terrifying my parents,
9 who are witnessing the government—a much larger, more powerful, and controlling
10 force—target their children by stripping them of the care they desperately need to stay alive. I'm
11 afraid of learned helplessness developing amongst transgender and gender-nonconforming
12 youth, who may stop seeking the care they need altogether because the accumulated stress of
13 living in a situation that they can't control or change is so overwhelming. I also fear that
14 hopelessness will spread among us therapists once we are unable to help our clients seek the
15 gender-affirming care they need and deserve. Taking away the ability for trans and gender
16 expansive children to receive gender-affirming care will be devastating for my clients. It is
17 frightening for me as a provider to no longer be able to offer my new parent-clients resources
18 that once existed because the federal government is removing them so quickly. I can sit with my
19 clients in their pain, but because of this executive order I will no longer be able to refer them to
20 the life-saving services and treatment they need.

21 19. I'm passionate about my work and the rights of transgender or gender expansive
22 persons. I have a gender expansive young adult, which is part of the reason I love working with
23 this population.

24 20. I do not have the financial resources to challenge the Executive Order in court,
25 and it would be incredibly stressful to do so under the threat of potential criminal prosecution. I
26 will do whatever I can to support my clients, even if it means risking criminal charges.

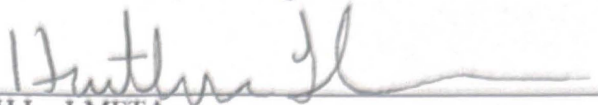
1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this ____ day of February 2025 at Seattle, Washington.
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6 H.L., LMFTA
7 Licensed Marriage and Family Therapist-Associate
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2 United States of America that the foregoing is true and correct.

3 DATED this 3 day of February 2025 at Seattle, Washington.

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